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March 15, 2002

Ms. Karen Cibulskis
Remedial Project Manager
U.S. EPA Region V
77 W. Jackson Boulevard
Chicago, Illinois 60605

U.S. EPA Contract No.: 68-W7-0026
Work Assignment No.: 139-RICO-05MZ
Document Control No.: RFW139-2D-AKTC

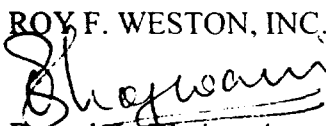
RE: Response to U.S. EPA Comments on Health and Safety Plan (HASP) Amendment No.1 and
Revised HASP Amendment No. 1 (Revision No. 1)
Evergreen Manor Site, Roscoe, Illinois

Dear Ms Cibulskis:

Roy F. Weston, Inc. (WESTON®) is pleased to submit the response to the 4 March 2002 U.S. EPA comments on the Health and Safety Plan (HASP) Amendment No.1 and the Revised HASP Amendment No. 1 (Revision No. 1). WESTON is also submitting and incorporating a Task Risk page into the amendment that addresses the U.S. EPA's concerns. This Task Risk page, along with the revised HASP Amendment No. 1 (Revision 1) and the original HASP will be on site during all field sampling activities. WESTON feels that this information along with WESTON's own Health and Safety Training program will ensure compliance with 29 CFR 1910.120.

If you have any questions or need additional information please feel free to contact me at (847) 918-4005 or via email at bhojwand@mail.rfweston.com.

Very truly yours,

ROY F. WESTON, INC.

Deepak L. Bhojwani
Site Manager

DLB:ld

Enclosures

cc: J. Burton (WESTON)

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**Response to Comments
HASP Amendment No. 1
Evergreen Superfund Site
Roscoe, Illinois**

U.S. EPA Comment No. 1: The HASP does not provide for the establishment of an exclusion zone or other work zones. The site activities include groundwater sampling. Normally, an exclusion zone would be established around any drilling or boring operations. Please revise the HASP.

WESTON Response: WESTON will designate an exclusion zone around the drilling equipment. A minimum 20 foot diameter circle around the back end of the drill rig will be established as the exclusion zone. Where feasible, a ten foot exclusion zone will be established around the monitoring well sampling locations. In addition to an exclusion zone, a decontamination zone will be established near the drilling operations. A centralized decontamination area will probably not be established for the groundwater, sediment, or surface water sampling. Decontamination will occur near each sampling location. Drilling safety will be in accordance with WESTON's Drilling Safety Guide located in the Site Safety Officers Field Manual.

U.S. EPA Comment No. 2: The HASP does not prohibit eating, drinking or smoking in potentially contaminated locations. Please revise the HASP to prohibit these activities from these areas.

WESTON and any WESTON subcontractors will refrain from eating, drinking, or smoking in any designated exclusion zone. Any eating, drinking, or smoking will be minimized and will occur out of any contaminated areas and away from residences.

U.S. EPA Comment No. 3: The HASP does not describe the procedures for site communications or emergency alerting. Please revise the HASP to include this information.

WESTON has several field operating procedures (FLDs) which discuss site security and emergency communication. These are included in the Site Safety Officers Field Manual which is required to be on every site. In addition, the original Health and Safety plan discusses site communication, emergency contacts, and procedures in the Contingency sections (Forms 15 and 16). Site communications including emergency information and contacts will be discussed in the health and safety briefings and will be communicated to any new personnel that enter the site.

U.S. EPA Comment No. 4: The HASP does not specify the posting areas for the hospital route map. The posting areas for the hospital route map should be specified in the Emergency Response Plan section. Please revise.

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A complete Health and Safety plan, including a hospital map and directions will be available in the front seat of each Weston vehicle and/or with each field team. The hospital map and directions will be detailed in the site health and safety briefings and will be communicated to any new personnel that enter the site.

U.S. EPA Comment No. 5: Due to the unavailability of the Safety Officer Field Manual in Attachment C, the Safety Procedures/Field Operating Procedure (FLD OP) could not be verified. Please review the FLD OPs to verify and ensure that all of the FLD OPs fulfill OSHA's 29 CFR 1910.120 requirements.

WESTON has an extensive health and safety program and tracks compliance with OSHA requirements. WESTON's FLD Ops will be available onsite in the Safety Officer Field Manual.

Inter-Office Memorandum



TO: T. Balla CC: VHI HASP File – electronic
FROM: D. Walker/D. Bhojwani DATE: 15 March 2002
PROJECT: U.S. EPA/RAC – Evergreen Manor W. O. NO.: 20064.139.100
(Orig. W.O.# 20064.036.100)
AMENDMENT NO: 1 (Revision 1) REASON FOR AMENDMENT: Further delineation of the known groundwater (GW) contamination in preparation for a Feasibility Study.
SUBJECT: Amendment of the Original HASP Dated 20 April 2000 (Document Control No. RFW036-2D-AFGP).

Introduction

This document is an amendment to the original HASP associated with the Evergreen Manor superfund site in Roscoe, Illinois. Contaminants of concern (COCs) remain as indicated in the Original HASP. These COCs are present at low ppb levels. Higher levels of GW contamination are not anticipated and intrusive activities into potential source areas are not anticipated; therefore, potential for chemical exposure is expected to be low.

Scope

The scope of work covered under this amendment is geophysical survey, groundwater sampling and surface water / sediment sampling. Vehicle traffic may also be present a hazard in various areas. Access to a Waste Management transfer facility will be required and a safety briefing will be coordinated with facility staff prior to working on that property. Refer to the Task-By-Task Risk Assessment –Form 8 for the hazards identified at the site, the protection and the safety procedures required and/or the field operating procedures (FLD OPs) utilized.

Personal Protective Equipment

Work is planned in modified Level D as outlined in the Original HASP with the exception of booties and outer Nitrile gloves. These PPE would be used on an as needed basis, as dictated by actual site conditions/potential for contaminant contact.

Exclusion Zone Protocols

An exclusion zone will be established around the drilling equipment. A minimum of 20-foot diameter circle around the back end of the drill rig will be established as the exclusion zone. Where feasible, a ten-foot exclusion zone will be established around the monitoring well sampling locations. In addition to an exclusion zone, a decontamination zone will be established near the drilling operations. A centralized decontamination area will probably not be established for the groundwater, sediment, or surface water sampling. Decontamination will occur near each sampling location. Any eating, drinking, or smoking will be minimized and will occur out of any contaminated areas and away from residences. Drilling safety will be in accordance with WESTON's Drilling Safety Guide located in the Site Safety Officers Field Manual.

Air Monitoring/Action Levels

Based on site data/history, initial/periodic PID/FID air monitoring with a TVA 1000 will be required during temporary and monitoring well installation activities. **If readings exceed background levels (sustained in the breathing zone), WORK STOPPAGE WILL BE REQUIRED** for reevaluation of site conditions, contaminant levels, etc. and consultation with H&S staff regarding the need for additional monitoring, PPE upgrades, etc.

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Personnel

A. Slesers (D-S), K. Richardson (D-S), and/or B. Schaefer (D-S) will perform the fieldwork. A. Slesers will handle SHSC responsibilities for the duration of the field effort. D. Bhojwani is now the Project Mgr. with J. Burton as the Program Mgr.

Other updates

Hospital and other emergency information (including the map/route to Hospital) has been verified.

The WESTON VHI office address is now at 750 East Bunker Court – Vernon Hills, IL. Phone # is (847) 918-4000.

The MSDS for Kerosene (steam cleaner fuel) and Alconox (decontamination detergent) are attached. HCL is the only anticipated sample preservative and its MSDS is already included in the HASP.

Subcontractor H&S evaluation forms will be completed and attached once the appropriate subcontractors have been identified. If the selected Subcontractor firm chooses to adopt and work under the WESTON HASP (as updated by this amendment), the appropriate reviews and indemnification paperwork will be completed at that time and prior to the Subcontractor starting work on site.

Hazard Assessment and Equipment Selection:

In accordance with WESTON's Personal Protective Equipment Program and 29 CFR 1910.132, at the site prior to personnel beginning work, the SHSC and/or the Site Manager have evaluated conditions and verified that the personal protective equipment selection outlined within this HASP is appropriate for the hazards known or expected to exist. (Refer to Safety Officer Manual Section 1, Personal Protection Program, for guidance.)

☒ SHSC ☐ Site Andris Slesers Date: _____
Manager

Review and Approval Documentation:

Reviewed by:
SO/DSM/CEHS Tonya Balla Date: _____
Name (Print) Signature

Other _____ Date: _____
Name (Print) Signature

Approved by:
Project Manager Deepak L. Bhojwani Date: _____
Name (Print) Signature

Amendment start date:
7 January 2002

This site HASP amendment must be reissued or reapproved for any activities conducted after:

Amendment end date:
15 June 2002

Date: 15 June 2002

TASK-BY-TASK RISK ASSESSMENT-FORM 8

(COMPLETE ONE SHEET FOR EACH TASK)

TASK DESCRIPTION

Monitoring well installation, groundwater sampling, surface water and sediment sampling

EQUIPMENT REQUIRED/USED

(Be specific, e.g., hand tools, heavy equipment, instruments, PPE)

Drill rig, steam cleaner, TVA 1000, modified level D PPE, hand tools, pump, water level meter, generator

POTENTIAL HAZARDS/RISKS

Chemical

☒ Hazard Present Risk Level: ☐ H ☐ M ☒ L

What justifies risk level?

PPE will be utilized to minimize contact with water and sediments. Based on historical data, concentrations are anticipated to be low. A TVA 1000 will be utilized during monitoring well installation.

Physical

☒ Hazard Present Risk Level: ☐ H ☐ M ☒ L

What justifies risk level?

Drill rig, traffic, slip/trip/fall, weather related concerns, and repetitive motion during sampling. Adherence to WESTON SOPs, including the Drilling Safety Guide, will minimize associated risks. An exclusion zone of 20 feet will be in place around the rear of the drill rig. Ten foot diameter exclusion zones will be established around groundwater sampling locations to minimize physical and chemical hazards. A decontamination zone will be designated during drilling activities. Other tasks will have individual decontamination zones, as necessary.

Biological

☒ Hazard Present Risk Level: ☐ H ☐ M ☒ L

What justifies risk level?

Insects and rodents may be present due to the proximity of the river and creek. Poisonous plants are also anticipated. Animals are not expected to be of concern, however, domestic animals could be loose in the residential neighborhoods. General awareness/avoidance and required PPE should address the hazards. Also refer to Bloodborne pathogen FLD 43. First aid kits (including Ivy block and post exposure cream), small eye wash bottle, and bloodborne pathogen kit will be available on site.

RADIOLOGICAL

☒ Hazard Present Risk Level: ☐ H ☐ M ☒ L

What justifies risk level?

Hazard is expected to be minimal. Sunlight is only potential source. Sunscreen will be available, as necessary.

LEVELS OF PROTECTION/JUSTIFICATION

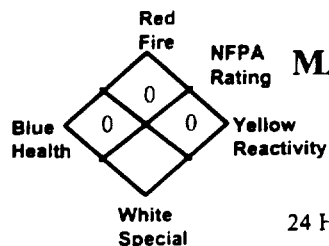
Work will begin in modified level D PPE. If vapor levels exceed action levels, work will stop and additional PPE and air monitoring will be evaluated.

SAFETY PROCEDURES REQUIRED AND/OR FIELD OPS UTILIZED

Field Operating Procedures: 1, 2, 3, 5, 6, 7, 10, 11, 12, 14, 15, 19, 20, 22, 29, 30, 32, 34, 35, 37, 38, 39, 41, 43, 43, and 2.5 (Drilling Safety Guide – located in Site Safety Officers Field Manual)

Site communication and emergency procedures will be in accordance with FLD 14 (site security), FLD 41 (Standard Hand/Emergency Signals), and Forms 15 and 16 of the original HASP (Contingencies). Hospital route maps will be available in each Weston vehicle or at a minimum with each Weston work crew. A site trailer is not anticipated for field activities. Food, beverages, and smoking will not be allowed in any designated exclusion zone area.

Alconox®



MATERIAL SAFETY DATA SHEET

Alconox, Inc.
30 Glenn Street, Suite 309
White Plains, NY 10603

24 Hour Emergency Number – Chem-Tel (800) 255-3924

I. IDENTIFICATION

Product Name (as appears on label)	ALCONOX
CAS Registry Number:	Not Applicable
Effective Date:	January 1, 1999
Chemical Family:	Anionic Powdered Detergent
Manufacturer Catalog Numbers for sizes	104, 1125, 1150, 1101, 1103 and 1112

II. HAZARDOUS INGREDIENTS/IDENTITY INFORMATION

There are no hazardous ingredients in ALCONOX as defined by the OSHA Standard and Hazardous Substance List 29 CFR 1910 Subpart Z.

III. PHYSICAL/CHEMICAL CHARACTERISTICS

Boiling Point (F):	Not Applicable
Vapor Pressure (mm Hg):	Not Applicable
Vapor Density (AIR=1):	Not Applicable
Specific Gravity (Water=1):	Not Applicable
Melting Point:	Not Applicable
Evaporation Rate (Butyl Acetate=1):	Not Applicable
Solubility in Water:	Appreciable-Soluble to 10% at ambient conditions
Appearance:	White powder interspersed with cream colored flakes.

IV. FIRE AND EXPLOSION DATA

Flash Point (Method Used):	None
Flammable Limits:	LEL: No Data UEL: No Data
Extinguishing Media:	Water, dry chemical, CO ₂ , foam
Special Fire fighting Procedures:	Self-contained positive pressure breathing apparatus and protective clothing should be worn when fighting fires involving chemicals.
Unusual Fire and Explosion Hazards:	None

V. REACTIVITY DATA

Stability:	Stable
Hazardous Polymerization:	Will not occur
Incompatibility (Materials to Avoid):	None
Hazardous Decomposition or Byproducts:	May release CO ₂ on burning

VI. HEALTH HAZARD DATA

Route(s) of Entry:	Inhalation? Yes Skin? No Ingestion? Yes
Health Hazards (Acute and Chronic):	Inhalation of powder may prove locally irritating to mucous membranes. Ingestion may cause discomfort and/or diarrhea. Eye contact may prove irritating.
Carcinogenicity:	NTP? No IARC Monographs? No OSHA Regulated? No
Signs and Symptoms of Exposure:	Exposure may irritate mucous membranes. May cause sneezing.
Medical Conditions Generally Aggravated by Exposure:	Not established. Unnecessary exposure to this product or any industrial chemical should be avoided. Respiratory conditions may be aggravated by powder.
Emergency and First Aid Procedures:	Eyes: Immediately flush eyes with water for at least 15 minutes. Call a physician. Skin: Flush with plenty of water. Ingestion: Drink large quantities of water or milk. Do not induce vomiting. If vomiting occurs administer fluids. See a physician for discomfort.

VII. PRECAUTIONS FOR SAFE HANDLING AND USE

Steps to be Taken if Material is Released or Spilled:	Material foams profusely. Recover as much as possible and flush remainder to sewer. Material is biodegradable.
Waste Disposal Method:	Small quantities may be disposed of in sewer. Large quantities should be disposed of in accordance with local ordinances for detergent products.
Precautions to be Taken in Storing and Handling:	Material should be stored in a dry area to prevent caking.
Other Precautions:	No special requirements other than the good industrial hygiene and safety practices employed with any industrial chemical.

VIII. CONTROL MEASURES

Respiratory Protection (Specify Type):	Dust mask - Recommended
Ventilation:	Local Exhaust-Normal Special-Not Required Mechanical-Not Required Other-Not Required
Protective Gloves:	Impervious gloves are useful but not required.
Eye Protection:	Goggles are recommended when handling solutions.
Other Protective Clothing or Equipment:	None
Work/Hygienic Practices:	No special practices required

THE INFORMATION HEREIN IS GIVEN IN GOOD FAITH BUT NO WARRANTY IS EXPRESSED OR IMPLIED.